



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

409 3rd Street, SW, Suite 300
Washington, DC 20024

WARNING LETTER

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

September 24, 2007

Mr. Reed Robinson
Vice President, Pipeline Engineering Services
Columbia Gas Transmission Corporation
1700 MacCorkle Avenue, SE
Charleston, West Virginia 25314

CPF 1-2007-1009W

Dear Robinson:

During the week of July 17, 2006, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected Granite State Gas Transmission Corporation (Granite State) in Portsmouth, New Hampshire.

As a result of the inspection, it appears that you have committed probable violations of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations. The items inspected and the probable violations are:

1. **§192.605 Procedural manual for operations, maintenance, and emergencies**

(a) General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations.

The operator's procedures require that odorant level readings be taken monthly not to exceed 40 days. During 2004 and 2005, there were two odorant level reading intervals in which the operator failed to meet the procedure requirement. Odorant level readings were taken on March 2 and April 13, 2004, 44 days between readings, and on November 29, 2005 and January 11, 2006, 43 days between readings, with no readings taken in December 2005.

The probable violation was based on the PHMSA inspector's review of the operator's procedures, the work orders and odorant test records for the relevant months.

2. **§192.709 Transmission lines: Record keeping.**

Each operator shall maintain the following records for transmission line for the periods specified:

(c) A record of each patrol, survey, inspection, and test required by subparts L and M of this part must be retained for at least 5 years or until the next patrol, survey, inspection, or test is completed, whichever is longer.

Granite State maintains records to document the monthly odorant level tests performed by its technicians. Odorant level test record information was not consistent with respect to the test dates, the test technician, the test locations, the rotameter readings and percent (%) gas-in-air concentrations for the following:

A. January 2004

There are two separate dates on the Work Order (WO) Completion Data Block on the Distribution Work Order: completion date of 1/23/04 and start date of 1/21/04. The corresponding Odor Test Form (OTF) has a date of 1/23/04 for the two New Hampshire test sites and the two Maine test sites. It is uncertain which work was done on 1/21/04 and 1/23/04. In addition, the two gas-in-air readings in Maine do not correspond with any rotameter float (glass or metal) readings on either of the operator's two odorometers.

B. February 2004

Two individuals signed the WO, only one signed the OTF. It is uncertain which individuals performed the odorometer readings at the four sites. The Maine readings have non-credible gas in air concentrations (two decimal points) recorded (4.5% and 1.5%). The Maine readings do not correspond to the recorded rotameter readings on either of the odorometer conversion charts.

C March 2004

Two different individuals signed the WO with no name on the OTF where the four tests were recorded. None of the rotameter readings corresponded with a recorded gas-in-air reading on the rotameter conversion chart.

D May 2004

There are two dates and two names on the WO indicating a start date of 5/10/04 and a completion date of 5/21/04, with only one name on the OTF making it questionable as to who performed the tests and when the tests were performed.

E October 2004

There is a start date of 10/6/04 and a completed date of 10/16/04 with one signature on the WO. There is another signature on the OTF for 10/6/04. The New Hampshire readings are non-credible with gas-in-air concentrations recorded as 1.5% and 1.5%.

F November 2004

WO has two signatures and two dates while the OTF has only one signature and one date. The readings (rotameter reading/ % gas-in-air) going down the form are 4/ 6%, 3/ 2.5%, 35/ 2.6%, and 4/ 3%. These readings are not credible.

G March 2005

A rotameter reading of 4.0 was recorded as 3.5% gas-in-air concentration. Readings of 0.4 and 0.45 were recorded as 3.5% and 3.75% gas-in-air concentrations.

H May 2005

The rotameter readings are recorded as 38 and 42. The rotameter scale only goes from 0 to 10.

I August 2005

There are apparently erased gas-in-air readings with no rotameter readings recorded for Maine. During August 2005, there are two names on the WO while only one name is on the OTF.

J September 2005

The rotameter readings for Debbie Lane in Maine, converts a 0.35 rotameter reading to 3.25% gas-in-air concentration. This is not consistent with either rotameter conversion chart. Two names are on the WO, no name is on the OTF.

The probable violation is based upon the operator's odorant test records for the above months and the rotameter conversion charts employed by Granite State.

Under 49 United States Code, § 60122, you are subject to a civil penalty not to exceed \$100,000 for each violation for each day the violation persists up to a maximum of \$1,000,000 for any related series of violations. We have reviewed the circumstances and supporting documents involved in this case, and have decided not to conduct additional enforcement action or penalty assessment proceedings at this time. We advise you to correct the items identified in this letter. Failure to do so will result in Granite State being subject to additional enforcement action.

No reply to this letter is required. If you choose to reply, in your correspondence please refer to **CPF 1-2007-1009W**. Be advised that all material you submit in response to this enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U S C 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U S C 552(b).

Sincerely,

A handwritten signature in black ink, appearing to read "Byron Coy", with a stylized flourish at the end.

Byron Coy, PE
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration